

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF MARYLAND

JESSICA LITZINGER,

Plaintiff,

vs.

BRADLEY A. MCGUIRK,

Defendant.

Tuesday, February 10, 2004

Deposition of

BRADLEY A. MCGUIRK,

the Defendant, called for examination by counsel for
the Plaintiff, pursuant to Notice, at 305 Washington
Avenue, Towson, Maryland 21204, commencing at 1:07
p.m., there being present on behalf of the respective
parties:

ON BEHALF OF THE PLAINTIFF:

DUANE VERDERAIME, ESQUIRE
1231 North Calvert Street
Baltimore, Maryland 21203

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LEGAL COUNSEL UNIT
M.S.P.

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1 Q After speaking with Sargent Blade -- was
2 there anything else you talked about with Sargent
3 Blades?

4 A Not at that point.

5 Q Okay. You talked to him at some other point?
6 Okay. When was that?

7 A Later on during the investigation.

8 Q Okay. At the scene or B

9 A At the scene.

10 Q At the scene, okay. At what point did you
11 talk to Sargent Blades again?

12 A After she -- Ms. Litzinger was placed in
13 handcuffs and placed in my patrol vehicle.

14 Q Okay. Rather than jump around too much, I'll
15 get back to that in a minute. So you relayed all this
16 information to Sargent Blades, I think your testimony
17 was you went back down to the -- the accident scene
18 where the people were; right?

19 A Yes, sir.

20 Q Okay. What did you do at that point then?

21 A Continued to try to find a witness, somebody

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1 that saw the accident, spoke to them again, tried to
2 find out who was driving this car.

3 Q Right. What else did you do to ascertain
4 that information?

5 A Ran checks on drivers' licenses and
6 registration on the car.

7 Q And when you say you tried to find out if
8 there were any witnesses, do you recall talking to
9 anybody, specifically?

10 A Whoever was at the scene.

11 Q Right.

12 A Nobody specifically.

13 Q What do you recall anybody saying?

14 A I wasn't able to find a witness to the
15 accident.

16 Q Okay. Then when you weren't able to find a
17 witness, what was -- what led you to believe you
18 couldn't find a witness? You had other people standing
19 there.

20 A Right. After speaking to them, nobody saw
21 the accident happen.

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1 Q Okay. And what did you -- what did you say
2 in that call?

3 A I don't recall.

4 Q Do you recall whether or not you mentioned
5 any particular injuries or not, or is it just like a
6 general call for an ambulance?

7 A I don't recall.

8 Q Okay. What did you -- other than calling for
9 an ambulance, what else did you do then, in response to
10 her saying, "I'm gasping for air. I can't breathe"?

11 A Well, that's when the handcuffs were taken
12 off of her, ambulance arrives.

13 Q Was she still in the car when you took the
14 handcuffs off?

15 A Yes, sir.

16 Q Okay. What else did you -- what else did you
17 -- while you're still in the car now, what else did you
18 say to Ms. Litzinger, anything?

19 A I don't recall.

20 Q Do you remember asking her about any money?

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